

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm protection plan cost recovery
clause.

DOCKET NO. 20210010-EI

DATED: July 12, 2021

COMMISSION STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-2021-0083-PCO-EI, filed February 17, 2021, the Staff of the Florida Public Service Commission files its Prehearing Statement.

1. All Known Witnesses

There are no known witnesses at this time.

2. All Known Exhibits

There are no known exhibits at this time.

3. Staff's Statement of Basic Position

Staff's positions are preliminary and based on materials filed by the parties and on discovery. The preliminary positions are offered to assist the parties in preparing for the hearing. Staff's final positions will be based upon all the evidence in the record and may differ from the preliminary positions stated herein.

4. Staff's Position on the Issues

ISSUE 1: What are the final Storm Protection Plan Cost Recovery Clause jurisdictional cost recovery true-up amounts for the period January 2020 through December 2020?

POSITION: Staff has no position pending evidence adduced at the hearing.

ISSUE 2: What are the actual/estimated Storm Protection Plan Cost Recovery Clause jurisdictional cost recovery true-up amounts for the period January 2021 through December 2021?

POSITION: Staff has no position pending evidence adduced at the hearing.

ISSUE 3: What are the projected Storm Protection Plan Cost Recovery Clause jurisdictional cost recovery amounts for the period January 2022 through December 2022?

POSITION: Staff has no position pending evidence adduced at the hearing.

ISSUE 4: What are the Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing Storm

Protection Plan Cost Recovery factors for the period January 2022 through December 2022?

POSITION: Staff has no position pending evidence adduced at the hearing.

ISSUE 5: What depreciation rates should be used to develop the depreciation expense included in the total Storm Protection Plan Cost Recovery Clause amounts for the period January 2022 through December 2022?

POSITION: Staff has no position pending evidence adduced at the hearing.

ISSUE 6: What are the appropriate jurisdictional separation factors for the projected period January 2022 through December 2022?

POSITION: Staff has no position pending evidence adduced at the hearing.

ISSUE 7: What are the appropriate Storm Protection Plan Cost Recovery Clause factors for the period January 2022 through December 2022 for each rate group?

POSITION: Staff has no position pending evidence adduced at the hearing.

ISSUE 8: What should be the effective date of the new Storm Protection Plan Cost Recovery Clause factors for billing purposes?

POSITION: Staff has no position pending evidence adduced at the hearing.

ISSUE 9: Should the Commission approve revised tariffs reflecting the new Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding?

POSITION: Staff has no position pending evidence adduced at the hearing.

FPL SPECIFIC ISSUES:

ISSUE 10: In the event that the Commission declines to approve FPL's pending request for unified rates in Docket No. 20210015-EI, what are the appropriate Storm Protection Plan Cost Recovery Clause factors for the period January 2022 through December 2022?

POSITION: Staff has no position pending evidence adduced at the hearing.

ISSUE 11: How should the assumptions used to develop FPL's 2022 Storm Protection Plan Cost Recovery Clause factors approved in this proceeding be revised to reflect

any changes or modifications adopted by the Commission in the 2021 Rate Case pending in Docket No. 20210015-EI?

POSITION: Staff has no position pending evidence adduced at the hearing.

MISCELLANEOUS ISSUE

ISSUE 12: Should this docket be closed?

POSITION: No. This is a continuing docket and should remain open until a new docket number is assigned next year.

5. Stipulated Issues

Staff has no stipulated issues at this time.

6. Pending Motions

Staff has no pending motions at this time.

7. Pending Confidentiality Claims or Requests

Staff has no pending confidentiality claims or requests at this time.

8. Objections to Witness Qualifications as an Expert

Commission staff has no objections to witness qualifications as an expert at this time.

9. Compliance with Order No. PSC-2021-0083-PCO-EI

Staff has complied with all requirements of the Order Establishing Procedure entered in this docket.

Respectfully submitted this 12th day of July, 2021.

/s/ Shaw Stiller

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that STAFF'S PREHEARING STATEMENT has been filed with the Office of Commission Clerk and that a true copy has been furnished to the following by electronic mail this 12th day of July, 2021:

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